

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
SPRING VALLEY BRANCH; JULIO
CLERVEAUX; CHEVON DOS REIS; ERIC
GOODWIN; JOSE VITELIO GREGORIO;
DOROTHY MILLER; HILLARY MOREAU;
and WASHINGTON SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL
DISTRICT and MARYELLEN ELIA, IN HER
CAPACITY AS THE COMMISSIONER OF
EDUCATION OF THE STATE OF NEW
YORK,

Defendants.

17 Civ. 8943 (CS) (JCM)

DECLARATION OF WASHINGTON SANCHEZ

WASHINGTON SANCHEZ, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

Background

1. I am a United States citizen. I am 46 years old. I am a Latino man.
2. My address is 10 Sebring Street, Spring Valley, New York 10977. I reside within the East Ramapo Central School District (“East Ramapo” or “the District”).
3. I was born in Ecuador, and Spanish is my native language. I immigrated to the United States when I was 25 years old, and I became a United States citizen in July 2015.
4. I have resided in the District for the past 20 years.
5. I currently work in restoration.

6. I am a registered voter in the District.

Voting and Lack of Representation on the Board

7. I have voted in every election for members of the East Ramapo Board of Education (the “Board”) since I have been eligible to do so.

8. Since 2016, none of the Board candidates who I voted for were elected, except for Sabrina Charles-Pierre who ran unopposed in 2016. In 2016, I voted for Jean Fields, Kim Foskew, and Natashia Morales, who each lost their races. In 2017, I voted for Eric Goodwin, Chevon Dos Reis, and Alexandra Manigo, who all lost.

9. In both 2016 and 2017, I saw the candidates who I voted for campaigning in minority neighborhoods, including my neighborhood, which is primarily Latino families. I also saw their campaign signs posted in my neighborhood. I did not see campaign signs for Mark Berkowitz, Harry Grossman, Joel Frielich or Yehuda Weissmandl in my neighborhood.

10. The candidates who I have voted for have made efforts to appeal to Latino voters, including providing campaign materials in Spanish. For example in May 2017, I attended a campaign rally for Ms. Dos Reis, Ms. Manigo, and Mr. Goodwin in Memorial Park in Spring Valley. The event was advertised in Spanish. Many Latino and black people attended and spoke at the event in English and in Spanish.

11. Of the three black members of the Board, I only voted for Ms. Charles-Pierre. I did not vote for Mr. Charles or Mr. Germain. I do not know of any black or Latino voters who voted for Mr. Charles or Mr. Germain. I do not recall Mr. Charles or Mr. Germain campaigning in any black or Latino neighborhoods or making any effort to appeal to black or Latino voters.

12. In the current electoral system for the Board, I feel as if my vote does not count, but I vote anyway because it is my responsibility as a member of the community. Many people in

my community do not vote even if they are eligible because they tell me they also feel as if their vote will not count. I have tried to tell those people to vote anyway, but they tell me that their votes will not matter because they already know who will win the election.

13. If the District had a ward system, people in my community would be more likely to vote. In a ward system, I would think about running for a Board seat because I would feel like I could win and make a difference as a member of the Board.

Quality of the District's Public Schools

14. I have one child, B.S., who is ten years old. He attended public school in East Ramapo from kindergarten until 5th grade.

15. In 2010, when my son was four years old, I wanted to enroll him in the District's public pre-kindergarten program, but there were no spots available. Instead, I enrolled my son in a private pre-kindergarten, which cost my family approximately \$130 per week. That was a significant expense for us, and we had to buy lower quality food and clothing to accommodate the extra expense.

16. In 2011, when B.S. was eligible for kindergarten, he was sent to a half-day kindergarten program, which lasted less than three hours. I wanted my son to be in a full-day kindergarten program because I thought that would provide him with a better learning opportunity. To make sure B.S. received adequate education as a kindergartener, we enrolled him in a private kindergarten program beginning after the public program ended at 10:30 a.m. That was also a significant expense for my family, but because we value education, we made the sacrifice.

17. B.S.'s class sizes in the public school have consistently been too large. Last year, at El Dorado Elementary School, B.S.'s 4th grade class had 32 students. In 3rd grade, he was in a

class with over 30 students. In kindergarten through 2nd grade, his classes were also very large, which negatively impacted the time that the teachers were able to devote to each student.

18. Art education is very important for me because my son enjoys art very much and learns well through art classes. When my son was in private pre-kindergarten and kindergarten, he received art education. B.S. did not have any art education when he was in 1st through 3rd grades. To ensure that B.S. received at least some art education in 3rd grade, I enrolled him in an afterschool art program at the Martin Luther King Jr. Center in Spring Valley. Last year, I was told that art would be restored for my son's 4th grade, but that there were no art supplies, even though there was an art teacher, so the students watched movies and read, but did not do any actual art projects.

19. This year, for 5th grade, I moved B.S. from public school to a private Catholic school because the education he received in the East Ramapo public schools was so poor. At his private school, B.S. is in a class with only 21 children; he receives good attention from his teachers; he is given homework and does it on his own because he understands the material, and he receives art education, which he enjoys very much.

Lack of Responsiveness of the Board

20. I have regularly attended Board meetings over the past four years. I attend Board meetings because I think it is important to know what is happening in the District and to support the students, parents, and community members who advocate on behalf of the public schools.

21. During various Board meetings, I have watched members of the community voice their concerns about the quality of the schools and the lack of quality education and afterschool programs for students, but frequently, the Board does not appear to listen to the community's concerns.

22. At times, the Board has been openly hostile towards Latino public school students. In June 2014, Joel Klein, the superintendent at the time, said that immigrant students “want to learn the language. They want free lunch, breakfast and whatever else they can get. They know they cannot get a diploma. [. . .] It’s a major, major issue.” After that remark, the Latino community rallied to protest Mr. Klein’s remarks and to demand Mr. Klein’s resignation. Mr. Klein was not removed from his position for over a year.

23. The Board sometimes provides inadequate translation services for Spanish-speaking attendees of Board meetings. Board meetings did not have any Spanish translation until December 2014—after several months of protests in response to Mr. Klein’s remarks about immigrant students—even though there are many Spanish-speaking people in the District and many of the District’s students are Latino. During the public comment period, Board members were frequently disrespectful to Spanish-speaking people. Board members have earpieces through which they receive translation services, but some Board members did not put in their ear pieces, or removed their ear pieces while a member of the public was speaking Spanish. On one occasion, I recall that the District had only approximately 30 translation headsets available for a meeting attended by over 200 parents who needed translation services.

24. I have been a member of a group called Padros Unidos, which includes parents of public school students from many countries. This group works to support the District’s public schools and students. We have asked the Board to meet with us in our neighborhood, so that more people from the public school community can attend and voice their concerns. However, the Board will only agree to meet with a few members of our group and only in private.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Spring Valley, New York

November __, 2017

Washington Sanchez



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City of New York, State of New York, County of New York

I, Angela Lo, hereby certify that the document, “**Washington Sanchez Declaration__94777022_4_0**” is, to the best of my knowledge and belief, a true and accurate translation from English into Spanish (US).

Angela Lo

Sworn to before me this
December 6, 2017

Signature, Notary Public



Stamp, Notary Public

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